

EPA REGISTRATION NUMBER 68850-1 – VOL. 2

PYXIS REGULATORY CONSULTING, INC.

11324 17th Ave. Ct. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

November 29, 2012

COURIER DELIVERY

Venus Eagle (PM 1)
Document Processing Desk (**FNL LBL**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: Ensystex Inc. – EST-1 Insecticide Concentrate (EPA Reg. No. 68850-1)
Submission of a Final Printed Label per the Agency Letter dated November 19, 2012

Dear Ms. Eagle,

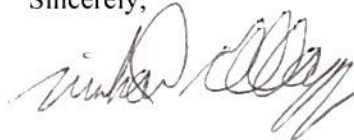
On behalf of Ensystex Inc. and in response to the Agency letter dated November 19, 2012, enclosed please find a final printed label for EST-1 Insecticide Concentrate (EPA Reg. No. 68850-1).

In support of this submission, please find the following:

1. Application for Pesticide Registration (EPA Form 8570-1)
2. One (1) copy of the EST-1 Insecticide Concentrate final printed label
3. Letter of Authorization

Please feel free to contact me ((253) 853-7369, Mike@PyxisRC.com) if you have any questions or need any additional information.

Sincerely,



Michael Kellogg

cc: D. Nimocks; Ensystex, Inc.



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 68850-1	2. EPA Product Manager V. Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Ensystex Inc. / EST-1 Insecticide Concentrate	PM# 1	
5. Name and Address of Applicant (Include ZIP Code) Ensystex Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated 11/19/2012
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of a final printed label per the Agency letter dated November 19, 2012.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
* Certification must be submitted				Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 4.4 lb.		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Michael Kellogg		Title Agent		Telephone No. (Include Area Code) 253-853-7369	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title Agent			
4. Typed Name Michael Kellogg		5. Date 11/29/12			

EST-1 Insecticide Concentrate

Active Ingredient:

Diflubenzuron – N-[[[4-chlorophenyl] amino]carbonyl]-2,
6-difluorobenzamide 99.4%
Other Ingredients: 0.6%
Total: 100.0%

EPA Reg. No. 68850-1 EPA Est. 68850-NC-001

Precautionary Statements

Hazards to Humans and Domestic Animals

KEEP OUT OF REACH OF CHILDREN

CAUTION

Avoid breathing dust and avoid contact with skin, eyes and clothing. Wash thoroughly with soap and water after handling.

FIRST AID	
If on skin or clothing	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15-20 minutes.• Call a poison control center or doctor for treatment advice.
If in eyes	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice.
If inhaled	<ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth if possible.• Call a poison control center or doctor for further treatment advice.
HOTLINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-369-4352 for emergency medical treatment information.	

Environmental Hazards

This product is extremely toxic to aquatic organisms. Do not discharge effluent containing this product into any body of water unless this product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product into sewer systems without first notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in original container in a secure, dry storage area. Prevent cross contamination with other pesticides and fertilizers. Do not store above 125 degrees Fahrenheit for extended periods of time. If container is damaged or spill occurs, use product immediately or dispose of product as indicated below.

Pesticide Disposal: Waste resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Handling: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into manufacturing equipment. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into manufacturing equipment or store for disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration.

Directions for Use

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

This product is for manufacturing use only for formulation into an insecticide for the following uses: (1) termite bait (2) uses for which EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration (3) uses for experimental purposes that are in compliance with EPA requirements.

Warranty Limitations and Disclaimer

Ensysrex warrants that at the time of delivery, this product will conform to its chemical description on the label. This is the only warranty made on this product. To the extent consistent with applicable law, Ensysrex expressly disclaims any implied warranties of merchantability or fitness for a particular purpose and any other expressed or implied warranties except as set forth above. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of this product and does not rely on any oral or written statements or representations.

Ensysrex supports and recommends only those uses specifically listed under Directions for Use. To the extent consistent with applicable law, Ensysrex expressly disclaims any and all liability for losses and damages (including claims based on negligence, strict liability or other legal theories) resulting from any use of this product other than those supported and recommended by Ensysrex.

ENSYSTEX, Inc.

P. O. Box 87329, Fayetteville, NC 28302

EPA 20121119

Net Weight: 4.4 Lbs. (2 Kg)

NOT REVIEWED
In Accordance with PR Notice 82-2
Based on Draft Labeling Dated

11-19-12

ENSYSTEX, Inc.

2713 Breezewood Ave., Fayetteville, NC 28303 USA

Telephone - 1-910-485-5720 x 5203 Fax - 1-888-368-4749 email david@ensystex.com

August 13, 2007

To Whom It May Concern:

RE: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as agent for Ensystex, Inc. (EPA Company Number 68850), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely,



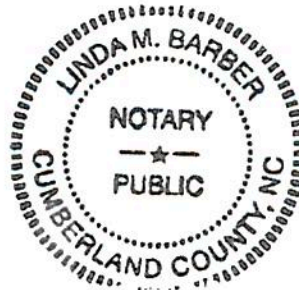
David Nimocks
Chairman

cc: Pyxis Regulatory Consulting, Inc.

Notary

*Signed and sworn before me this 13th
day of August 2007.
My commission expires May 01, 2008*

*Linda M Barber
Notary Public*



*State of NC
County of Cumberland.*

Material to be added to an e-Jacket/Jacket

Reg. No. 68850-1

Description: _____

1. ☐ Placement within the e-Jacket/jacket:
- ☐ Default: (chronological, top = newest)
 - ☐ File Location: (PDF page number, i.e., "before page 45")
- _____
- _____

2. ☐ Send to Data Extraction contractors this material:

- ☐ Newly stamped accepted label
- ☐ Notification
- ☐ New CSF

☒ Other: Amended label

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's Name: Sam Samiel

Phone: 703 305 5409 Division: ROS

Date: 11/19/12



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

NOV 19 2012

Mr. Ross Gilbert
Ensystex Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332

Subject: Submission of Amended Labeling to Revise Storage and Disposal Language, First Aid Language and Warranty Statement Language.

EST-1 Insecticide Concentrate
EPA Reg. No. 68850-1
Your submission date: October 4, 2012

Dear Mr. Gilbert:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act as amended is acceptable. A stamped copy is enclosed for your records. Submit one copy of your final printed labeling before you release the product for shipment. If there are questions contact Dani Daniel at 703 305-5409 or at daniel.dani@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "John Hebert", written over a large, stylized, looping flourish.

John Hebert
Product Manager (07)
Insecticide/Rodenticide Branch
Registration Division (7505P)

EST-1 Insecticide Concentrate

Active Ingredient:

Diflubenzuron – N-[[[4-chlorophenyl] amino]carbonyl]-2,
6-difluorobenzamide99.4%
Other Ingredients:0.6%
Total:100.0%

EPA Reg. No. 68850-1 EPA Est. 68850-NC-001

Precautionary Statements

Hazards to Humans and Domestic Animals

KEEP OUT OF REACH OF CHILDREN

CAUTION

Avoid breathing dust and avoid contact with skin, eyes and clothing. Wash thoroughly with soap and water after handling.

FIRST AID

If on skin or clothing	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15-20 minutes.• Call a poison control center or doctor for treatment advice.
If in eyes	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice.
If inhaled	<ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth if possible.• Call a poison control center or doctor for further treatment advice.

HOTLINE NUMBER

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-369-4352 for emergency medical treatment information.

Environmental Hazards

This product is extremely toxic to aquatic organisms. Do not discharge effluent containing this product into any body of water unless this product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product into sewer systems without first notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in original container in a secure, dry storage area. Prevent cross contamination with other pesticides and fertilizers. Do not store above 125 degrees Fahrenheit for extended periods of time. If container is damaged or spill occurs, use product immediately or dispose of product as indicated below.

Pesticide Disposal: Waste resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Handling: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into manufacturing equipment. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into manufacturing equipment or store for disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration.

Directions for Use

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

This product is for manufacturing use only for formulation into an insecticide for the following uses: (1) termite bait (2) uses for which EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration (3) uses for experimental purposes that are in compliance with EPA requirements.

Warranty Limitations and Disclaimer

Ensystem warrants that at the time of delivery, this product will conform to its chemical description on the label. This is the only warranty made on this product. To the extent consistent with applicable law, Ensystem expressly disclaims any implied warranties of merchantability or fitness for a particular purpose and any other expressed or implied warranties except as set forth above. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of this product and does not rely on any oral or written statements or representations.

Ensystem supports and recommends only those uses specifically listed under Directions for Use. To the extent consistent with applicable law, Ensystem expressly disclaims any and all liability for losses and damages (including claims based on negligence, strict liability or other legal theories) resulting from any use of this product other than those supported and recommended by Ensystem.

ENSYSTEM, Inc.

P. O. Box 87329, Fayetteville, NC 28302

[EPA approval date]

Net Weight: Lbs.

ACCEPTED
NOV 19 2012

Under the Federal Insecticide, Fungicide,
and Rodenticide Act, as amended, for the
pesticide registered under:

EPA. Reg. No: 68850-1



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 68850-1	2. EPA Product Manager V. Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Ensyslex Inc. / EST-1 Insecticide Concentrate	PM# 1	
5. Name and Address of Applicant (Include ZIP Code) Ensyslex Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of amended label. As no data are being submitted with this amendment, nor will data need to be reviewed to approve the proposed amendment, Ensyslex Inc. believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
* Certification must be submitted				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
	If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt No. per container		<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 4.4 lb.	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product		
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Ross Gilbert	Title Agent	Telephone No. (Include Area Code) 253 853-7369
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Agent	
4. Typed Name Ross Gilbert	5. Date 10/4/2012	

PYXIS REGULATORY CONSULTING, INC.

11324 17th Ave. Ct. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

October 4, 2012

COURIER DELIVERY

Venus Eagle (PM1)
Document Processing Desk (**AMEND**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: Ensystex Inc. – EST-1 Insecticide Concentrate (EPA Reg. No. 68850-1)
Submission of Label Amendment Revising Storage and Disposal Language, First Aid Language
and Warranty Language

Dear Ms. Eagle,

On behalf of Ensystex Inc., please find the enclosed application to amend EST-1 Insecticide Concentrate (EPA Reg. No. 68850-1). The revisions that have been made are as follows: revised Storage and Disposal language; revised First Aid language; revised Warranty language.

In support of this amendment application, we submit the following documents:

1. Application for Pesticide Registration (EPA Form 8570-1)
2. One (1) copy of the proposed label with changes tracked
3. Five (5) copies of the proposed labeling with changes incorporated
4. Certification With Respect to Label Integrity
5. One copy of the EST-1 Insecticide Concentrate proposed label on CD
6. Letter of Authorization

As no data are being submitted with this amendment, nor will data need to be reviewed to approve the proposed amendment, Ensystex Inc. believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee.

Please feel free to contact me ((253) 853-7369, Ross@PyxisRC.com) if you have any questions or need any additional information.

Sincerely,



Ross Gilbert

cc: D. Nimocks; Ensystex, Inc.

ENSYSTEX, Inc.

2713 Breezewood Ave., Fayetteville, NC 28303 USA
Telephone - 1-910-485-5720 x 5203 Fax - 1-888-368-4749 email david@ensystex.com

August 13, 2007

To Whom It May Concern:

RE: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as agent for Ensystex, Inc. (EPA Company Number 68850), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely,



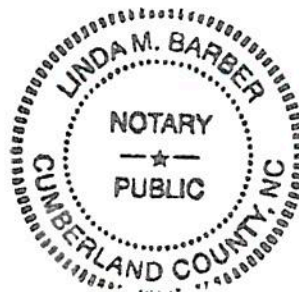
David Nimocks
Chairman

cc: Pyxis Regulatory Consulting, Inc.

Notary

*Signatures and Sworn before me this 13th
day of August 2007.
My commission expires May 06, 2009*

*Linda M Barber
Notary Public*



*State of NC
County of Cumberland.*